

ORIGINAL

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U.S.D.C. Atlanta

FEB 14 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Kevin P. Weimer, Clerk
By: *[Signature]* Deputy Clerk

UNITED STATES OF AMERICA

v.

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO;
LUIS CONTRERAS DOMINGUEZ;
BLADIMIR HERNANDEZ;
LOUIS "JOSHUA" DOMINGUEZ;
JUAN CONTRERAS PAVON;
ROSA PEREZ CRUZ;
RAMON CASTRO PEREZ;
LAKESHA JACKSON; AND
DANIELA AGUIRRE

Criminal Indictment

1^o 24 - CR - 0056

Under Seal

THE GRAND JURY CHARGES THAT:

Count One
Conspiracy to Possess with Intent to Distribute Controlled Substances
21 U.S.C. § 846

Beginning on a date unknown, but at least from in or about July 2018, and continuing until in or about June 2022, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ-TORRES, AND
RAMON CASTRO PEREZ,

did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with each other, and with others known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), that is to

knowingly and intentionally possess with intent to distribute a controlled substance, said conspiracy involving:

- at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(A), as to defendant MONICA DOMINGUEZ TORRES, and
- at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B), as to defendant RAMON CASTRO PEREZ,

all in violation of Title 21, United States Code, Section 846.

Count Two
Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841

On or about May 27, 2022, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ TORRES, AND
RAMON CASTRO PEREZ,

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a controlled substance, said act involving:

- at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(A), as to defendant MONICA DOMINGUEZ TORRES, and

- at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B), as to defendant RAMON CASTRO PEREZ,

all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**Count Three
Money Laundering Conspiracy
18 U.S.C. § 1956(h)**

Beginning on a date unknown, but at least from in or about July 2018, and continuing until on or about the date of this Indictment, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO,
LUIS CONTRERAS DOMINGUEZ,
BLADIMIR HERNANDEZ,
LOUIS "JOSHUA" DOMINGUEZ,
JUAN CONTRERAS PAVON,
ROSA PEREZ CRUZ,
RAMON CASTRO PEREZ,
LAKESHA JACKSON, AND
DANIELA AGUIRRE,

did knowingly combine, conspire, confederate, agree and have a tacit understanding with each other, and with others known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Sections 1956 and 1957, as follows:

- to knowingly conduct and attempt to conduct a financial transaction in and affecting interstate and foreign commerce, which transaction involved the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, and, while conducting and attempting to conduct such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing the transaction was designed in whole and in part:
 - to conceal and disguise the nature, source, ownership, and control of proceeds of such unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and
 - to avoid a transaction-reporting requirement under state or Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii);
- to knowingly engage in a monetary transaction by, through, and to financial institutions, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, the distribution of controlled substances, in violation of Title 18, United States Code, Section 1957,

all in violation of Title 18, United States Code, Section 1956(h).

**Counts Four through Sixteen
Money Laundering Transactions - Concealment
18 U.S.C. § 1956(a)(1)(B)(i)**

On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO,
LUIS CONTRERAS DOMINGUEZ,
BLADIMIR HERNANDEZ,
LOUIS "JOSHUA" DOMINGUEZ,
JUAN CONTRERAS PAVON,
RAMON CASTRO PEREZ, AND
LAKESHA JACKSON,

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly conduct the financial transactions listed in the table below, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of proceeds of such unlawful activity, each transaction constituting a separate count as set forth below:

Count	Date	Defendant(s)	Financial Transaction
4	January 7, 2020	MONICA DOMINGUEZ TORRES	Purchase of the real property located at 2833 Jodeco Terrace, Jonesboro, Georgia, for \$230,000
5	July 1, 2020	JUAN CONTRERAS GUERRERO	Purchase of a vehicle, a 2018 Lexus LC, for \$103,846.71, involving \$9,000 in U.S. currency
6	November 5, 2020	MONICA DOMINGUEZ TORRES AND LAKESHA JACKSON	Purchase of a vehicle, a 2021 Mercedes Benz GLE, for \$103,884, involving a \$50,000 cashier's check
7	December 16, 2020	JUAN CONTRERAS GUERRERO	Purchase of a vehicle, a 2019 GMC Sierra, for \$69,914.41, involving \$10,000 in U.S. currency
8	March 9, 2021	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2021 Lexus IS, for \$51,303.24, involving \$9,900 in U.S. currency and \$5,100 through a payment card
9	March 15, 2021	BLADIMIR HERNANDEZ AND LOUIS "JOSHUA" DOMINGUEZ	Purchase of a vehicle, a 2021 Honda Accord, for \$36,282, involving \$9,900 in U.S. currency
10	August 17, 2021	JUAN CONTRERAS GUERRERO AND RAMON CASTRO PEREZ	Purchase of a vehicle, a 2021 Chevrolet Silverado, for \$84,672.87, involving \$33,000 in U.S. currency
11	October 1, 2021	MONICA DOMINGUEZ TORRES AND LOUIS "JOSHUA" DOMINGUEZ	Wire transfer of \$20,000 from LJD Drywall LLC, Wells Fargo account x7149 to Dallas Capital Bank account x2257

Count	Date	Defendant(s)	Financial Transaction
12	February 18, 2022	JUAN CONTRERAS GUERRERO	Transfer and delivery of \$50,000 in U.S. currency
13	April 12, 2022	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2022 Lexus IS, for \$54,965.85, involving a Chase Bank cashier's check in the amount of \$48,000 and \$6,965.85 paid through an American Express credit card
14	September 25, 2023	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2024 Porsche Macan, for \$119,346, involving \$14,000 in U.S. currency and the trade-in of a vehicle, a 2022 Lexus IS
15	October 30, 2023	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2024 Porsche Cayenne, for \$109,378.90, involving the trade-in of a vehicle, a 2024 Porsche Macan
16	November 25, 2023	BLADIMIR HERNANDEZ	Purchase of a vehicle, a 2024 Mercedes GLE AMG 63, for \$162,163.21, involving the trade-in of a vehicle, a 2021 Mercedes GLE AMG, \$9,000 in U.S. currency, and \$9,000 paid through a Bank of America debit card from account x7672

all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Title 18, United States Code, Section 2.

**Counts Seventeen through Nineteen
Money Laundering Transactions – Concealment and Avoiding Transaction
Reporting Requirements
18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii)**

On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO,
LUIS CONTRERAS DOMINGUEZ,
BLADIMIR HERNANDEZ,
JUAN CONTRERAS PAVON,
ROSA PEREZ CRUZ,
RAMON CASTRO PEREZ, AND
DANIELA AGUIRRE,

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly conduct the financial transactions listed below, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and that, while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of proceeds of such unlawful activity and to avoid a transaction-reporting requirement under state or Federal law, each transaction constituting a separate count as set forth below:

Count	Date	Defendant(s)	Financial Transaction
17	February 23, 2021	MONICA DOMINGUEZ TORRES, JUAN CONTRERAS GUERRERO, BLADIMIR HERNANDEZ, JUAN CONTRERAS PAVON, ROSA PEREZ CRUZ AND DANIELA AGUIRRE	Purchase of the real property located at 421 Canterbury Way, Jonesboro, Georgia for \$725,000
18	November 17, 2021	MONICA DOMINGUEZ TORRES AND DANIELA AGUIRRE	Purchase of the real property located at 1309 Marseille Court SW, Conyers, Georgia, for \$565,000
19	December 14, 2021	MONICA DOMINGUEZ TORRES, RAMON CASTRO PEREZ, LUIS CONTRERAS DOMINGUEZ AND DANIELA AGUIRRE	Purchase of the real property located at 532 Valley Woods Circle SE, Conyers, Georgia, for \$275,000

all in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii) and Title 18, United States Code, Section 2.

**Counts Twenty through Thirty-Eight
Monetary Transactions Greater than \$10,000
18 U.S.C. § 1957**

On or about the dates listed below, in the Northern District of Georgia and elsewhere, the defendants,

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO,
LUIS CONTRERAS DOMINGUEZ,
BLADIMIR HERNANDEZ,
LOUIS "JOSHUA" DOMINGUEZ,
JUAN CONTRERAS PAVON,
ROSA PEREZ CRUZ,
RAMON CASTRO PEREZ,
LAKESHA JACKSON, AND
DANIELA AGUIRRE,

aided and abetted by each other, and others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in the monetary transactions listed below by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, the possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), each transaction constituting a separate count as set forth below:

Count	Date	Defendant(s)	Monetary Transaction
20	December 31, 2019	MONICA DOMINGUEZ TORRES	Wire transfer of \$20,000 from Wells Fargo Bank Account x3874 to SunTrust Bank Account x2575
21	April 16, 2020	MONICA DOMINGUEZ TORRES	Purchase of the real property located at 2947 Preston Drive, Rex, Georgia for \$80,000
22	August 19, 2020	MONICA DOMINGUEZ TORRES	Withdrawal of \$10,187.60 through a debit card transaction, for purchase of goods from Louis Vuitton, through Wells Fargo account x3874
23	November 5, 2020	MONICA DOMINGUEZ TORRES AND LAKESHA JACKSON	Purchase of a vehicle, a 2021 Mercedes Benz GLE, for \$103,884, involving a \$50,000 Wells Fargo bank cashier's check
24	February 23, 2021	MONICA DOMINGUEZ TORRES, JUAN CONTRERAS GUERRERO, BLADIMIR HERNANDEZ, JUAN CONTRERAS PAVON, ROSA PEREZ CRUZ, AND DANIELA AGUIRRE	Purchase of the real property located at 421 Canterbury Way, Jonesboro, Georgia for \$725,000

Count	Date	Defendant(s)	Monetary Transaction
25	March 9, 2021	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2021 Lexus IS, for \$51,303.24, involving \$9,900 in U.S. currency and \$5,100 through a payment card
26	June 14, 2021	MONICA DOMINGUEZ TORRES	Withdrawal of \$10,483.20 through a debit card transaction, for purchase of goods from Louis Vuitton, through Wells Fargo account x3874
27	August 17, 2021	JUAN CONTRERAS GUERRERO AND RAMON CASTRO PEREZ	Purchase of a vehicle, a 2021 Chevrolet Silverado, for \$84,672.87, involving \$33,000 in U.S. currency, financed through CarMax Auto Finance
28	September 9, 2021	JUAN CONTRERAS GUERRERO	Payment of \$11,000 with a check from Wells Fargo bank account x8861
29	October 1, 2021	MONICA DOMINGUEZ TORRES AND LOUIS "JOSHUA" DOMINGUEZ	Wire transfer of \$20,000 from LJD Drywall LLC, Wells Fargo account x7149 to Dallas Capital Bank account x2257
30	October 25, 2021	JUAN CONTRERAS GUERRERO	Payment of \$50,000 with a check from Wells Fargo bank account x8861
31	November 3, 2021	JUAN CONTRERAS GUERRERO	Purchase of a Wells Fargo cashier's check (Check No. x3348) for \$55,000

Count	Date	Defendant(s)	Monetary Transaction
32	November 17, 2021	MONICA DOMINGUEZ TORRES AND DANIELA AGUIRRE	Purchase of the real property located at 1309 Marseille Court SW, Conyers, Georgia, for \$565,000
33	December 14, 2021	MONICA DOMINGUEZ, LUIS CONTRERAS DOMINGUEZ, RAMON CASTRO PEREZ, AND DANIELA AGUIRRE	Purchase of the real property located at 532 Valley Woods Circle SE, Conyers, Georgia, for \$275,000
34	March 25, 2022	JUAN CONTRERAS GUERRERO	Payment of \$11,346 with a check from Wells Fargo bank account x8861
35	April 12, 2022	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2022 Lexus IS, for \$54,965.85, involving a Chase Bank cashier's check in the amount of \$48,000 and \$6,965.85 paid through an American Express credit card
36	September 25, 2023	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2024 Porsche Macan, for \$119,346, involving \$14,000 in U.S. currency
37	October 30, 2023	LUIS CONTRERAS DOMINGUEZ	Purchase of a vehicle, a 2024 Porsche Cayenne, for \$109,378.90, involving the trade-in of a vehicle, a 2024 Porsche Macan, for \$90,000

Count	Date	Defendant(s)	Monetary Transaction
38	November 25, 2023	BLADIMIR HERNANDEZ	Purchase of a vehicle, a 2024 Mercedes GLE AMG 63, for \$162,163.21, involving the trade-in of a vehicle, a 2021 Mercedes GLE AMG, \$9,000 in U.S. currency, and \$9,000 paid through a Bank of America debit card from account x7672

all in violation of Title 18, United States Code, Section 1957 and Title 18, United States Code, Section 2.

Forfeiture

Upon conviction of one or more of the offenses alleged in Counts One and Two of this Indictment, the defendants,

**MONICA DOMINGUEZ TORRES, AND
RAMON CASTRO PEREZ,**

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to, the following:

- (a) **MONEY JUDGMENT:** A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense, or conspiracy to commit such offense, alleged in Counts One and Two of this Indictment.

(b) REAL PROPERTY:

1. 532 Valley Woods Circle Southeast, Conyers, Georgia 30094

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 143 of the 10th District of Rockdale County, Georgia and being Lot 725, ROLLING GREENS SUBDIVISION, UNIT 1, as per plat recorded in Plat Book "I", Page 97, Rockdale County, Georgia records, to which reference is hereby made for the purpose of incorporating the same herein.

2. 1309 Marseille Court Southwest, Conyers, Georgia 30094

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 178 of the 11th District of Rockdale County, Georgia, being Lot 25 of the Avignon Subdivision, according to plat recorded in Plat Book 36, Pages 86-87, Rockdale County, Georgia records, which plat is incorporated herein by reference and made a part hereof.

3. 2947 Preston Drive, Rex, Georgia 30273

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 86 of the 12th District of Clayton County, Georgia and being Lot 6, Block A, Unit One of Heather Lynn Subdivision, as per plat recorded in Plat Book 10, Page 363, Clayton County, Georgia Records.

4. 2833 Jodeco Terrace, Jonesboro, Georgia 30236

Legal Description:

All that tract or parcel of land lying and being in Land Lot 27 of the 6th District of Clayton County, being Lot 4, Block B, of the Summit at Lake Jodeco, Unit IV, as per plat recorded in Plat Book 24, Page 60, Clayton County Deed Records, which plat is incorporated herein by reference and made a part of this description.

Upon conviction of one or more of the offenses alleged in Counts Three through Thirty-Eight of this Indictment, the defendants,

MONICA DOMINGUEZ TORRES,
JUAN CONTRERAS GUERRERO,
LUIS CONTRERAS DOMINGUEZ,
BLADIMIR HERNANDEZ,
LOUIS "JOSHUA" DOMINGUEZ,
JUAN CONTRERAS PAVON,
ROSA PEREZ CRUZ,
RAMON CASTRO PEREZ,
LAKESHA JACKSON, AND
DANIELA AGUIRRE,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in said offenses, and any property traceable to such property, including but not limited to, the following:

(a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each

offense, or conspiracy to commit such offense, alleged in Counts Three through Thirty-Eight of this Indictment.

(b) REAL PROPERTY:

1. 532 Valley Woods Circle Southeast, Conyers, Georgia 30094

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 143 of the 10th District of Rockdale County, Georgia and being Lot 725, ROLLING GREENS SUBDIVISION, UNIT 1, as per plat recorded in Plat Book "I", Page 97, Rockdale County, Georgia records, to which reference is hereby made for the purpose of incorporating the same herein.

2. 1309 Marseille Court Southwest, Conyers, Georgia 30094

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 178 of the 11th District of Rockdale County, Georgia, being Lot 25 of the Avignon Subdivision, according to plat recorded in Plat Book 36, Pages 86-87, Rockdale County, Georgia records, which plat is incorporated herein by reference and made a part hereof.

3. 2947 Preston Drive, Rex, Georgia 30273

Legal Description:

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 86 of the 12th District of Clayton County, Georgia and being Lot 6, Block A, Unit One of Heather Lynn Subdivision, as per plat recorded in Plat Book 10, Page 363, Clayton County, Georgia Records.

4. 2833 Jodeco Terrace, Jonesboro, Georgia 30236

Legal Description:

All that tract or parcel of land lying and being in Land Lot 27 of the 6th District of Clayton County, being Lot 4, Block B, of the Summit at Lake Jodeco, Unit IV, as per plat recorded in Plat Book 24, Page 60, Clayton County Deed Records, which plat is incorporated herein by reference and made a part of this description.

If, any of the property described above, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

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the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

A Trye W. G. Salter BILL
FOREPERSON

RYAN K. BUCHANAN
United States Attorney



John T. DeGenova

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